

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: LOWER MANHATTAN DISASTER SITE  
LITIGATION

-----X 07CV01585(AKH)

EDIZON CHAVEZ AND MARTHA L CHAVEZ,

Plaintiffs,

- against -

ANSWER TO  
AMENDED  
COMPLAINT

110 CHURCH LLC,  
2 BROADWAY LLC,  
53 PARK PLACE, LLC,  
ALAN KASMAN DBA KASCO,  
ANN TAYLOR STORES CORPORATION,  
BATTERY PARK CITY  
AUTHORITY, BLACKMON-MOORING-STEAMATIC  
CATASTOPHE, INC. D/B/A BMS CAT, BOARD OF  
MANAGERS OF THE HUDSON VIEW EAST  
CONDOMINIUM, BROOKFIELD FINANCIAL PROPERTIES,  
INC., BROOKFIELD FINANCIAL PROPERTIES, LP  
BROOKFIELD PARTNERS, LP, BROOKFIELD  
PROPERTIES CORPORATION, BROOKFIELD PROPERTIES  
HOLDINGS INC., COLLIERS ABR INC,  
ENVIROTECH CLEAN AIR, INC., GPS  
ENVIRONMENTAL CONSULTANTS, INC., HUDSON VIEW  
EAST CONDOMINIUM, HUDSON VIEW TOWERS  
ASSOCIATES, INDOOR ENVIRONMENTAL TECHNOLOGY,  
INC., KASCO RESTORATION SERVICES CO.,  
LIBERTY VIEW ASSOCIATES LP,  
LIONSHED 110 DEVELOPMENT LLC,  
LIONSHED DEVELOPMENT LLC,  
MERRILL LYNCH & CO, INC.,  
NOMURA HOLDING AMERICA INC,  
NOMURA SECURITIES INTERNATIONAL INC,  
RY MANAGEMENT CO., INC., RY  
MANAGEMENT,  
RELATED BPC ASSOCIATES INC,  
RELATED MANAGEMENT CO LP,  
SABINE ZERARKA, STRUCTURE TONE (UK),  
INC., STRUCTURE TONE GLOBAL SERVCIES, INC.,  
THE RELATED COMPANIES LP,  
THE RELATED REALTY GROUP INC,

TOSCORP INC,  
TUCKER ANTHONY INC,  
VERIZON NEW YORK, INC, WESTON SOLUTIONS, INC.,  
WFP TOWER A CO  
WFP TOWER A CO GP CORP  
WFP TOWER A CO LP,  
WFP TOWER B CO GP CORP,  
WFP TOWER B HOLDING CO,  
WFP TOWER B HOLDING CO LP,  
WFP TOWER D CO. G.P.CORP., WFP TOWER D HOLDING CO. I L.P., WFP  
TOWER D HOLDING CO. II L.P., WFP TOWER D HOLDING  
I G.P. CORP., AND WFP TOWER D. CO., L.P., ET AL

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PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. (“Envirotech”), as and for their responses to the allegations set forth in the Amended Complaint by Adoption (“Check-off Complaint”) related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech’s Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York  
March 7, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT  
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BY:   
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